

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 9**

NOLAN ENTERPRISES, INC. D/B/A
CENTERFOLD CLUB

and

Case 09-CA-220677

BRANDI CAMPBELL, AN INDIVIDUAL

Respondent Nolan Enterprises' Unopposed Motion to Relocate Hearing

Now comes Respondent, Nolan Enterprises d/b/a Centerfold Club, and requests that the hearing in this matter, set to commence on January 28, 2019 and to last for 3 days, be relocated from Cincinnati, Ohio to Columbus, Ohio.

It will be a significant hardship on Respondent and its witnesses to attend a 3-day hearing in Cincinnati, which is over 100 miles away. All of Respondent's managerial staff is expected to testify and, if the hearing is held in Cincinnati, Respondent may have no choice but to close its business in order to adequately defend itself at the hearing. In addition, all of the entertainers who Respondent will call at the hearing and all of the entertainers the General Counsel intends to call as witnesses at the hearing reside in Columbus.

General Counsel does not oppose this motion and, in fact, consents to the transfer.

Respectfully submitted,

/s/ Christina L. Corl

Christina L. Corl (0067869)

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CERTIFICATE OF SERVICE

Please take notice that counsel hereby certifies the foregoing Motion to Relocate Hearing was transmitted to all parties electronically on this **January 18, 2019**.

/s/ Christina L. Corl
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